#### UNITED STATES DISTRICT COURT FOR THE DISTRICT OF VERMONT

JENNIFER A. CONNORS,

**PLAINTIFF** 

v.

DARTMOUTH HITCHCOCK MEDICAL CENTER, DARTMOUTH MEDICAL SCHOOL, MARY HITCHCOCK MEMORIAL HOSPITAL, DARTMOUTH-HITCHCOCK CLINIC and TRUSTEES OF DARTMOUTH COLLEGE,

**DEFENDANTS** 

CASE NO. 2:10-cv-94 CASE NO. 2:12-cv-51

### CONNORS v DHMC et al Case No. 2:10-cv-94 USDC VT HON. WILLIAM K. SESSIONS, III, PRESIDING

EXHIBIT	DESCRIPTION	STIPULATED	OFFERED	ADMITTED
1	Residency Grid WLF Bates 3287	NO		
2	Child and Adolescent Program Grid WLF Bates 3298	NO		
3	Summary Evaluation Grid WLF Bates 3288-3297	NO		
4	DHMC Psychiatry Residency for Jennifer Connors, MD WLF Bates 3311	NO		

5	Graduate Medical Education 2008-09 Red Book CONNORS RPOD 000107-000177	YES	
6	Global Resident Competency Rating Form WLF Bates 3300-3301	NO	
7	ACGME Program Requirements for Graduate Medical Education in Psychiatry WLF Bates 2091-2124		
8	James C. Beck, MD Curriculum Vitae WLF Bates 3302-3310	YES	
9	Beck Expert Report	NO	
10	Beck Documents WLF Bates 1863-2393, 3217-3233	NO	
11	Jennifer Connors, MD Curriculum Vitae WLF Bates 3234-3239	YES	
12	Psychopharm Clinic Summary WLF Bates 2321	NO	
13	Evaluations WLF Bates 210-471	YES	

14	Resident/Fellow Agreement of Appointments 2006-2009 WLF Bates 107-109, 110-	YES	
15	Proposed Resident/Fellow Agreements of Appointments and Related Emails WLF Bates 117-126		
16	GMEAC Fair Hearing Policy WLF Bates 3-5	YES	
17	12/18/06 Sateia-JC Email WLF Bates 2017	YES	
18	12/18/06 RG-JC Email WLF Bates 726	YES	
19	2/28/07 Summary of Items to be Addressed WLF Bates 692-93	YES	
20	2/28/07 Summary of Items to be Addressed w/JC Notes WLF Bates 694	YES	
21	3/1/07 Schwartz-RG et al emails WLF Bates 695	YES	

22	RG Note to File 3/10/07 WLF Bates 696-97	YES	
23	3/21/07 Connors-Sateia email WLF Bates 1319		
24	4/3/07 Proposed Remediation Plan WLF Bates 710-716	YES	
25	4/11/07 Remediation Plan CONNORS 000280- 290	YES	
26	Kelleher Notes CONNORS 000320-321	NO	
27	Kelleher Notes CONNORS 000323-324	NO	
28	Kelleher Notes on Remediation Draft CONNORS 000325-328		
29	4/13/07 Sateia Email to RG WLF Bates 1321		
30	RG Ltr to JC 4/13/07 CONNORS 000215-216	YES	
31	4/13/07 Remediation Plan WLF Bates 727-28	YES	
32	4/16/07 JC-RG Correspondence WLF Bates 761-762		

33	4/19/07 JC-RG Email WLF Bates 763		
34	4/25/07 JC-RG Correspondence WLF Bates 764-767		
35	4/30/07 HWP -RG Email CONNORS 000261	YES	
36	4/30/07 JC memo to Koury CONNORS RPOD 000087	YES	
37	4/30/07 JC-Carboneau WLF Bates 1083	YES	
38	5/10/07 Murray Connors RPOD 000049- 50	YES	
39	9/7/07 RG Email and Ltr to NHH WLF Bates 782-83	YES	
40	9/14/07 Remediation Plan WLF Bates 113-114	YES	
41	10/8-11/07 RG - Coursin emails WLF Bates 785-786	YES	
42	11/16-18/07 RG - Coursin Emails WLF Bates 787-788	YES	

43	R. Green Email 11/20/07 Bates Connors 000101	YES
44	11/26-27/07 RG-JC Emails WLF 789	YES
45	12/21/07 RG Ltr Re Meeting w/JC WLF Bates 790	YES
46	12/26/07 Coursin-RG email WLF Bates 791	
47	12/27/07 RG-JC emails WLF Bates 792	YES
48	4/1/08 LL Email WLF Bates 3178	YES
49	4/25/08 Connors/Wallen Email WLF Bates 1335	
50	5/08 JC Note WLF Bates 1337	
51	4/24-5/7/08 Emails WLF Bates 1338-41	
52	5/6/08 JC Note to Ladue WLF Bates 1342	
53	6/3/08 JC Email WLF Bates 3163	YES
54	6/3/08 Ladue/JC Email WLF Bates 3162	YES

55	6/3/08 JC-Catalona Email WLF Bates 1343		
56	6/5/08 Catalona-JC Email WLF Bates 1344		
57	6/5/08 JC-Catalona Email WLF Bates 1345		
58	6/6/08 JC-Lambert Correspondence WLF Bates 2077		
59	6/17/08 LL -JC Email WLF Bates 3152	YES	
60	9/8/08 RG Note to File WLF Bates 811-12	YES	
61	9/17/08 Pomerantz Email to Psych Dept WLF Bates 2334	NO	
62	9/18-10/10/08 JC/Gardner et al Emails WLF Bates 3129-3130	YES	
63	10/22-24/08 Redacted Medical Records WLF Bates 2375-2385		
64	10/24/08 Summerall Email WLF Bates 3128	YES	

65	10/28/08 Kutter/LL/V. Watts WLF Bates 3125	YES	
66	11/3-12/4/08 Racusin Notes Re: Connors CAP Application Bates CONNORS/RACUSIN 0010-0015		
67	11/4/08 Kutter-LL et al Emails WLF Bates 3126		
68	11/7/08 West-Racusin Correspondence WLF Bates 664		
69	Donnelly-Racusin Correspondence WLF Bates 680-81		
70	11/7/08 V. Watts WLF Bates 975	YES	
71	11/10/08 Redacted Med Record WLF Bates 2370-74	YES	
72	11/17/08 Redacted Med Record WLF Bates 2361-69	YES	
73	Green Email 11/18/08 WLF Bates 3119	YES	
74	11/20/08 RG Memo WLF Bates 822-23	YES	

75	Bolton Email 11/20/08 WLF Bates 3117	YES	
76	11/20/08 Summerall Complaint 3118	YES	
77	11/18-20/08 RG seeks info for FFD 3119	YES	
78	11/20/08 RG Memo CONNORS 000108-09	YES	
79	12/3/08 JC Emails WLF Bates 977-985	YES	
80	12/4/08 McClellan/JC Email WLF Bates 3116	YES	
81	12/4/08 FFD no new accom. Refer to EAP Connors RPOD 000069		
82	Koury req to McClellan re: info from JC therapist 12/8/08 Connors RPOD 000071		
83	12/9/08 JC Consent form for EAP-McClellan communications RPOD 000086	YES	
84	"Sheaf Of Emails" WLF Bates 814-821	YES	

85	12/3/08 JC-V. Watts Email WLF Bates 977		
86	12/19/08 LL/Pomerantz et al email re: completion of PGY3 WLF Bates 3103	YES	
87	Lord Email 12/19/08 WLF Bates 3115	YES	
88	RG Note to File 1/2/09 WLF Bates 847-848	YES	
89	1/15-23/09 JC-V. Watts Emails WLF Bates 980-983		
90	RG Ltr to JC 1/28/09 WLF Bates 864-65	YES	
91	2/12/09 Koury Ltr CONNORS 690		
92	2/13/09 RG to JC WLF Bates 893	NO	
93	4/2/09 Wallace-JC Emails WLF Bates 2338	NO	
94	4/10/09 Hallmartel Note WLF Bates 2333	YES	
95	4/10/09 Sateia Ltr Recommendation WLF Bates 2178-2179		

96	6/11/09 RG Memo to Fair Hearing w/attachments WLF Bates 1941-1981	YES	
97	Fair Hearing Committee Decision WLF Bates 1937-1940	YES	
98	RG Ltr NH BOM 10/6/09 WLF Bates 971-972	YES	
99	Licensing materials sent by WLF to S&H WLF Bates 927-949	NO	
100	11/2/09 Summary Evaluation Resident/Fellow Performance w/attachment WLF Bates 951, 953	NO	
101	RG JC Completion Letter 11/3/09 WLF Bates 955-956	NO	
102	RG Letter Attesting to Gen Psych Board Eligibility 11/3/09 WLF Bates 952	NO	
103	DHMC submissions to VT and TX licensing boards Connors 000993-994	NO	

104	S&H pkg to DHMC executed by RG WLF Bates 950-972	NO	
105	EAP Individual Report Printed 12/13/10 CONNORS RPOD 000061-85		
106	UVM Semi-Annual Residency Review WLF Bates 3283-86	NO	
107	DHMC House Staff 2007-2008 WLF Bates 2743-2744		
108	7/27/07 Sateia Correspondence to NH BOM (Sateia Depo Ex 4) CONNORS RPOD 000092		
109	DHMC Residency Training Program in Adult Psychiatry WLF Bates 3312-3391		